

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of the Commission's Rules)	WT Docket No. 04-344
Regarding Maritime Automatic)	
Identification Systems)	
)	
Petition for Rule Making Filed by)	RM-10821
National Telecommunications and)	
Information Administration)	
)	
Emergency Petition for Declaratory)	
Ruling Filed by MariTEL)	
)	
Amendment of the Commission's Rules)	PR Docket No. 92-257
Concerning Maritime Communications)	

Request for Leave, if Required

Telesaurus and affiliated parties (the "Parties") filed well before 9 PM Pacific time today, 11-27-07, Reply Comments in this proceeding on ECFS (the "Reply Comments"). The EFCS system took over three minutes to process the submission after it was completed and the filer hit "Send Attached File to the FCC." The ECFS confirmation report thus showed a received date of 11-28-06. Telesaurus uses a high-speed DSL line from SBC, the filing was short, and the delay was not on our side. The filer, the undersigned, checked the DSC and filers computer immediately before and after the filing, for this purpose. Internet transfers of files of this size occur in a matter of seconds using a high speed DSL, unless there is a problem on one side. The problem was not on our side.

The filing should be considered timely filed on 11-27, for the above reason. If not so accepted, then the Parties hereby request the FCC grant leave to file, and

accept and process, the Reply Comments (the “Request for Leave”), (a) for a more full and complete record in this matter, (b) due to the unique new information and proposal made in the Reply Comments, and (c) due to the filing being nominally (several minutes) late, and since no party would be prejudiced thereby since these are Reply Comments regarding which no further pleadings are authorized, and in any case, in this regard, the party that may oppose this filing—MariTEL—is being immediately served, as follows:

Certificate of Service: The undersigned hereby certifies under penalty of perjury that he will, prior to 11 PM Pacific time today, 11-27-06, email a copy of the Reply Comments and a copy of this Request for Leave to legal counsel of record for MariTEL: Mr. Russell Fox, at his email address (RFox@mintz.com) listed currently on the website of the law firm at which he practices.¹ In addition, the undersigned will also, at the same time, email a copy of the Reply Comments and a copy of this Request for Leave to Mr. Hershey of the USCG at jhersey@comdt.uscg.mil.

Declaration

The undersigned declares under penalty of perjury that the facts in the above filing are true and correct.

Respectfully,

[Submitted electronically. Signature on File.]

Warren Havens, President
Telesaurus VPC LLC
Telesaurus Holdings GB LLC
AMTS Consortium LLC

¹ At: http://www.mintz.com/about/directory/biography/170/Russell_H_Fox/

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